

# EXHIBIT C



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office

440 West 200 South, Suite 500

Salt Lake City, UT 84101-1345

<http://www.blm.gov/utah>



**AUG 07 2019**

In Reply Refer To:  
3100 (UT-922)  
UTU93722

CERTIFIED MAIL – RERURN RECEIPT REQUESTED  
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### DECISION

Liberty Petroleum Corp.	:	Oil and Gas Lease
P. O. Box 1549	:	UTU93722
New York, New York 10028-0013	:	

### Suspension of Operations and Production

On March 19, 2019, the U.S. District Court for the District of Columbia issued a decision in *WildEarth Guardians, et al. vs. Zinke*, No. 1:16-cv-01724-RC (*WEG v. Zinke*), holding, among other things, that the offering and sale of certain oil and gas leases on Bureau of Land Management (BLM)-managed public lands in Wyoming did not comply with the National Environmental Policy Act (NEPA). Specifically, the court found that the NEPA documents the BLM relied on in offering and selling the leases did not adequately assess potential impacts involving greenhouse gas (GHG) emissions and climate change.

In *Southern Utah Wilderness Alliance v. David Bernhardt et al.*, (2:19-cv-00266) in the United States District Court for the District of Utah (consolidated with 4:19-cv-00013), the Plaintiffs allege that the BLM violated NEPA in offering and selling certain leases, including the above-referenced lease, at the December 2018 competitive lease sale, and raise similar arguments concerning GHG emissions and climate change.

Based on the parallels between the current appeal and *WEG v. Zinke*, and the BLM's review of the NEPA documents underlying the December 2018 competitive lease sale, the BLM has concluded that it is necessary to suspend the above-referenced lease until the completion of appropriate environmental analyses under NEPA. At such time, the BLM will issue a new decision concerning this suspension of operations and production (SOP) of the above-referenced lease.

This SOP is effective August 1, 2019. No lease operations may transpire on the lease, the terms of the lease are tolled, and lease rentals are suspended while this SOP is in place.

### Appeal Rights

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 C.F.R. Part 4 and the enclosed Form 1842-1. If an appeal is taken, the notice of appeal must be filed in this office (at the address shown on the enclosed Form) within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition for a stay pursuant to 43 C.F.R. Part 4, Subpart B §4.21, during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay must show sufficient justification based on the standards listed below. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

### Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall be evaluated based on the following standards:

1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of immediate and irreparable harm if the stay is not granted, and
4. Whether the public interest favors granting the stay.

Copies of the notice of appeal, petition for stay, and statement of reasons also must be submitted to each party named in this decision and to the Office of the Solicitor, Intermountain Region, 125 South State Street, Suite 6201, Salt Lake City, Utah 84138, at the same time the original documents are filed in this office. Parties who purchased parcels subject to any appeal from this decision must be served with a copy of any notice of appeal, petition for stay, and statement of reasons.

If you have any questions, please contact Robin Naeve, Fluid Mineral Branch Chief, at (801) 539-4254 or [rnaeve@blm.gov](mailto:rnaeve@blm.gov).



Kent Hoffman  
Deputy State Director  
Division of Lands and Minerals

Enclosure

cc:

James Karkut  
Office of the Regional Solicitor  
U.S. Department of the Interior  
125 S. State Street, Suite 6201  
Salt Lake City, Utah 84138

Jessica Bowlen  
Office of Natural Resources Revenue  
MS 63230B  
P.O. Box 25165  
Denver, Colorado 80225-0165

BLM District Managers – Canyon Country  
BLM Field Managers – Monticello

Form 1842-1  
(September 2006)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

DO NOT APPEAL UNLESS

1. This decision is adverse to you,  
AND
2. You believe it is incorrect

IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED

- |                             |   |
|-----------------------------|---|
| 1. NOTICE OF APPEAL .....   | A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the <i>Notice of Appeal</i> in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a <i>Notice of Appeal</i> in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413).   |
| 2. WHERE TO FILE            |   |
| NOTICE OF APPEAL.....       | Bureau of Land Management<br>Utah State Office<br>440 West 200 South, Suite 500<br>Salt Lake City, Utah 84101   |
| WITH COPY TO SOLICITOR...   | and<br>Office of the Regional Solicitor<br>U.S. Department of the Interior<br>125 South State Street, Suite 6201<br>Salt Lake City, Utah 84138  |
| 3. STATEMENT OF REASONS     |   |
| WITH COPY TO SOLICITOR..... | Within 30 days after filing the <i>Notice of Appeal</i> , file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the <i>Notice of Appeal</i> , no additional statement is necessary (43 CFR 4.412 and 4.413).<br><br>Office of the Regional Solicitor<br>U.S. Department of the Interior<br>125 South State Street, Suite 6201<br>Salt Lake City, Utah 84138  |
| 4. ADVERSE PARTIES.....     | Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the <i>Notice of Appeal</i> , (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413).   |
| 5. PROOF OF SERVICE.....    | Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)).  |
| 6. REQUEST FOR STAY.....    | Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a <i>Notice of Appeal</i> (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your <i>Notice of Appeal</i> (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the <i>Notice of Appeal</i> and Petition for a Stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.<br><br><b>Standards for Obtaining a Stay.</b> Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay. |

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that all communications are identified by serial number of the case being appealed.

**NOTE:** A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

(Continued on page 2)

STATE OFFICES AND AREAS OF JURISDICTION:

September 2006)